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15 Attorneys for Defendants
16 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 Plaintiff,

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR PRECIS
IN SUPPORT OF REQUEST TO FILE
MOTION IN LIMINE TO EXCLUDE
TESTIMONY AND OPINIONS OF
WAYMO EXPERT
LAMBERTUS HESSELINK OPINION
ON TS 25**

22 v.

23 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendants.

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1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and
 2 Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal their Precis in
 3 Support of Request to File Motion in Limine to Exclude Testimony and Opinions of Waymo
 4 Expert Lambertus Hesselink Opinion on TS 25. Specifically, Defendants request an order
 5 granting leave to file under seal the following confidential documents:

6 Document	7 Portions to Be Filed Under Seal	8 Designating Party
9 Precis in Support of Request to File Motion in Limine (“Precis”)	10 Highlighted Portions	11 Defendants (Blue) 12 Plaintiff (Green)

13 The blue-highlighted portions of the Precis contain highly confidential technical
 14 information considered by an Uber engineer. This highly confidential information is not publicly
 15 known. Disclosure of this information could allow competitors to understand a former head of
 16 Uber ATG’s thinking with respect to self-driving technology. (Declaration of Thomas J. Pardini
 17 in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Pardini Decl.”)
 18 ¶3.)

19 The green-highlighted portions of the Precis contain information that has been designated
 20 “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” by Waymo in accordance with
 21 the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties
 22 have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this
 23 material under seal in accordance with Paragraph 14.4 of the Protective Order. (Pardini Decl.
 24 ¶4.)

25 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
 26 documents at issue, with accompanying chamber copies.

27 Defendants served Waymo with this Administrative Motion to File Documents Under
 28 Seal on November 10, 2017.

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1 For the foregoing reasons, Defendants request that the Court enter the accompanying
2 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and
3 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –
4 ATTORNEYS' EYES ONLY."

5 Dated: November 10, 2017

MORRISON & FOERSTER LLP

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7 By: /s/ Michael A. Jacobs
MICHAEL A. JACOBS

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9 Attorneys for Defendants
UBER TECHNOLOGIES, INC. and
OTTOMOTTO LLC

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